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Counsel for Petitioner

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MAHMOUD KHALIL,

Petitioner,

v.

WILLIAM JOYCE ET AL.,

Respondent.

Case No. 2:25-cv-01963
(MEF)(MAH)

**CERTIFICATION OF VERA
EIDELMAN IN SUPPORT OF
APPLICATION FOR ADMISSION
PRO HAC VICE PURSUANT TO
LOCAL CIVIL RULE 101.1**

I, Vera Eidelman, hereby certify the following:

1. I am an attorney at the American Civil Liberties Union Foundation (“ACLU”). I have been requested to represent Petitioner in this matter.

2. I am a member in good standing of the New York State bar as of 2019.

3. I am also admitted to practice before the following courts:

Court	Year of Admission	Attorneys Rolls Maintained By:
New York State Appellate Division, Second Department	2019	Supreme Court, State of New York Appellate Division, Second Department 45 Monroe Place Brooklyn, NY 11201
California State (inactive)	2016	350 McAllister Street San Francisco, CA 94102-4797
U.S. Supreme Court	2023	1 First Street, NE Washington, DC 20543
U.S. Court of Appeals for the Second Circuit	2020	Thurgood Marshall United States Courthouse 40 Foley Square

		New York, New York 10007
U.S. Court of Appeals for the Fifth Circuit	2019	United States Court of Appeals Fifth Circuit Office Of the Clerk F. Edward Hebert Building 600 S. Maestri Place
U.S. Court of Appeals for the Eighth Circuit	2019	Thomas F. Eagleton Courthouse 111 South 10th Street Room 24.329 St. Louis, MO. 63102
U.S. Court of Appeals for the Ninth Circuit	2018	The James R. Browning Courthouse 95 7th Street San Francisco, CA 94103
U.S. Court of Appeals for the Tenth Circuit	2021	Byron White Court House 1823 Stout Street Denver, CO 80257
U.S. Court of Appeals for the Eleventh Circuit	2018	Elbert P. Tuttle Courthouse 56 Forsyth Street, N.W.

		Atlanta, GA 30303
U.S. District Court for the Southern District of New York	2023	500 Pearl Street, New York, NY 10007

4. No professional disciplinary proceedings are pending against me in any jurisdiction and no professional discipline has previously been imposed on me in any jurisdiction.

5. In the event I am admitted *pro hac vice*, I agree to:

- a. Make payment to the New Jersey Lawyer's Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) for each year in which I represent Petitioner in this matter;
- b. Abide by the Rules of this Court, including any relevant disciplinary rules;
- c. Notify this Court immediately of any matters affecting my standing at the Bar of any other Court; and
- d. Have all pleadings, briefs, and other papers filed with the Court signed by an attorney of record authorized to practice in the United States District Court for the District of New Jersey.

6. In view of the foregoing, I respectfully request that I be admitted *pro hac vice*.

Pursuant to 28 U.S.C. § 1746, I affirm under penalty of perjury that the above statements are true and correct.

Dated: March 21, 2025

Respectfully Submitted,
/s/Vera Eidelman
Vera Eidelman
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